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EPA Superfund
Record of Decision Amendment:

BROWN'S BATTERY BREAKING
EPA ID: PAD980831812
OU 02
HAMBURG, PA
05/31/2000

AMENDMENT TO THE RECORD OF DECISION

OPERABLE UNITS 1 AND 2

BROWN'S BATTERY BREAKING SITE

I. Introduction

Site Name: Brown's Battery Breaking.

Site Location: Tilden Township, Berks County, Pennsylvania

Lead Agency: U.S. Environmental Protection Agency, Region III ("EPA")

Support Agency: Pennsylvania Department of Environmental Protection ("PADEP")

A Record of Decision ("ROD") for the Brown's Battery Breaking Site ("Site") for Operable Unit One ("OU-1") was signed on September 28, 1990 and a ROD for Operable Unit Two ("OU-2") was signed on July 2, 1992. This Amendment to the Record of Decision is issued in accordance with Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"), 42 U.S.C. § 9617(c), and 40 C.F.R. § 300.435(c)(2)(I). This Amendment has been prepared to document the nature of the change made to the selected remedy identified in the RODs for OU-1 and OU-2; to summarize the information that led to the making of the changes; and to affirm that the revised remedy complies with the statutory requirements of CERCLA § 121, 42 U.S.C. § 9621. The amendment fundamentally alters the remedy selected in the RODs for OU-1 and OU-2 with respect to scope, performance, and cost. This amendment is incorporated into the Administrative Record for the Site.

New information became available following the issuance of the RODs for OU-1 and OU-2 which gave rise to the need for an amendment. Specific information acquired after the issuance of the RODs includes: the Federal Trustee requirements in Appendix G of the 1995 Consent Decree requiring implementation of OU-2 and completion of OU-1 ("Consent Decree"); test pitting activities conducted in December 1999; the Draft Final Remedial Design, January 2000; and documentation requesting changes to the RODs, January/February 2000.

II. SUMMARY OF THE SITE HISTORY, SELECTED REMEDY AND PRIOR MODIFICATIONS

The Brown's Battery Breaking Site is located in Tilden Township, approximately two miles northwest of Shoemakersville, Pennsylvania. The 14-acre Site is bordered by the Schuylkill River and Mill Creek in a predominantly agricultural area of Berks County. A one-story brick structure, a mobile home, and an automobile and truck service shop are located on the Site. A log house is located on an adjacent parcel, which has historically been considered to be part of the Site based

on its location, although no known disposal of hazardous substances has occurred on this property.

A battery recycling and lead recovery process operated at the Site from 1961 to 1971. A hydraulic guillotine opened the batteries, and their lead alloy grids were extracted for recycling. The sulfuric acid was poured onto the ground and the battery casings were deposited in nearby pits or on the surface adjacent to the battery breaking building. Beginning in 1965, the battery casings were rinsed with water to collect insoluble lead and the casings were crushed before being deposited throughout the Site or used in nearby areas as a substitute for fill or road and driveway gravel.

EPA conducted a Preliminary Assessment of the Site followed by an Extent of Contamination survey in 1983. The Extent of Contamination Survey concluded that capping of contaminated soil addressed the immediate threat by preventing direct contact with lead-bearing soils and dust by people living or working on the Site. EPA's Emergency Removal Program relocated three families residing on the Site in October 1983 for the duration of the construction. Excavation of the contaminated soils and battery casings began in January 1984 and continued until June 1984. Approximately 13,000 cubic yards of battery casings and contaminated soil were consolidated in the southwest portion of the Site (known as the "Containment Area") and capped with 6,000 cubic yards of low-permeability soil. The removal action was completed in July 1984 and the residents returned to the Site.

A 1990 toxicological review of lead in surface soils revealed the need again to relocate residents: EPA accomplished this by authorizing a temporary relocation under the Emergency Removal Program in June 1990 and signing the OU-1 ROD in September 1990 to permanently relocate residents, construct a fence around the Site, and place deed restrictions on the property.

EPA signed the ROD for OU-2 in July 1992 which selected a remedy to treat soil and battery casings using an innovative thermal treatment technology. The OU-2 ROD also selected a contingent remedy to stabilize the soil and battery casings onsite followed by disposal in an offsite landfill if the innovative thermal treatment technology proved impracticable or administratively infeasible. In addition, the OU-2 ROD required the installation of a vertical limestone barrier in the shallow aquifer and pumping and onsite treatment of groundwater from the bedrock aquifer.

Additional onsite soil removal, sediment and surface water monitoring, erosion control measures, and establishment of a Conservation Area were required by the Federal Natural Resource Trustees (National Oceanographic and Atmospheric Administration and Department of the Interior) ("Federal Trustees") as part of the Consent Decree with EPA, the General Battery Corporation, and the Site owner, which was finalized in 1995. These activities were integrated into the OU-2 cleanup strategy and are documented in the OU-2 Remedial Design.

EPA modified the OU-2 remedy with an Explanation of Significant Differences ("ESD") in December 1996 to allow treatment of contaminated soil and battery casings at off-site facilities

other than the lead smelter in Reading, Pennsylvania which was identified in the ROD for OU-2. EPA modified the OU-2 ROD a second time in December 1997 issuing an ESD to modify the groundwater cleanup standards. EPA decided to switch to the contingent remedy to solidify/stabilize the soils and battery casings in March 1998.

III. REASONS FOR ISSUING THE ROD AMENDMENT

The federal Trustees identified additional soil excavation areas to a depth of one foot (known as Appendix G Areas) after the issuance of the OU-2 ROD. A lead cleanup level of 200 parts per million ("ppm" or "mg/kg") for the Appendix G Areas was selected and documented in the OU-2 Remedial Design. The cleanup level for the soil in the OU-2 ROD Area is 1000 ppm lead. The Pre-Design Study, test pitting activities, and Remedial Design provide the necessary data to outline the extent of contamination and determine the boundaries of the soil excavation areas. This ROD Amendment describes a change that limits the excavation in Appendix G Areas where post-excavation samples will confirm the removal of all soil with lead exceeding 200 ppm. This Amendment also describes a change to utilize soils with less than 1000 ppm of lead for backfilling in the OU-2 ROD Area.

The Remedial Design also provides additional information which assists with the planning of the excavation sequence. The excavation sequence was discussed in the OU-2 ROD, prior to the issuance of Appendix G. This ROD Amendment reevaluates the sequence of excavating the Appendix G soils, the Containment Area, and other OU-2 ROD soils exceeding the 1000 ppm lead cleanup standard.

The OU-2 ROD requires the solidification/stabilization of all materials excavated from the Site prior to off-site disposal. Sampling during the Remedial Design revealed that some of the soil will be excavated from areas with marginal contamination. This Amendment allows the testing of individual piles of marginally contaminated soil to determine if treatment is necessary prior to off-site disposal.

The OU-2 ROD also requires the separation of incidental lead posts and plates from the casings prior to treatment. This ROD Amendment is clarifies the volume of incidental posts and plates that must be separated from the contaminated soil and battery casings.

The OU-1 ROD required the permanent relocation of the onsite residents and business and implementation of deed restrictions on the Site until a determination is made regarding future use. The OU-2 ROD requires deed restrictions be placed on the Site which limit future use to industrial applications. As a result of the excavation of Appendix G soils, one residential property will be remediated to the 200 ppm lead cleanup standard. This ROD Amendment changes the potential future use of this property.

The OU-1 ROD requires a six-foot fence with barbed wire be installed around the perimeter of the Site. This Amendment addresses the extent of fencing and the disposition of the fence following soil remediation.

IV. MODIFICATIONS TO THE SELECTED REMEDY

Post-excavation confirmation samples shall be collected from the bottom and sidewalls from all soil excavation areas. Appendix G of the Consent Decree requires the excavation of the upper twelve inches of soil in all areas identified by the Federal Trustees that contain unacceptable lead levels. EPA coordinated with the Federal Trustees, PADEP and the General Battery Corporation ("GBC"), the responsible party conducting the cleanup, throughout the remedial design process and has determined that the soil excavation can be limited to less than twelve inches provided confirmation sampling demonstrates the remaining soil lead concentration is less than 200 mg/kg.

Excavated soil with lead concentrations less than 1000 mg/kg may be used as backfill in the excavation areas required by the OU-2 ROD since the soil cleanup level for lead in this area is 1000 mg/kg. One foot of clean fill and/or topsoil must be placed above any Site soils used as backfill to eliminate the direct contact threat should any soils inadvertently exceed the acceptable level of 1000 mg/kg of lead in soil.

Individual piles of marginally contaminated soil must be tested prior to onsite stabilization to determine if treatment is required to meet applicable Resource Conservation and Recovery Act, as amended ("RCRA") Land Disposal Restrictions and any additional requirements of the receiving landfill. Piles meeting these criteria may be disposed without treatment. All soils with lead concentrations exceeding 1000 mg/kg must be disposed at the selected off-site landfill.

The sequencing of excavation areas shall be determined by the Final Remedial Design and the Remedial Action Work Plan. The sequencing of excavation activities shall be developed to minimize the amount of time any particular excavation area is left open. This approach will reduce the potential for contaminant release due to flood events. It is not necessary to excavate the Containment Area first as described in the OU-2 ROD.

It is not anticipated that a significant volume of lead post and plates will be encountered because the sale of such material was a source of income for the previous owner of the Site. If the combination of lead posts and/or plates exceed five per cubic foot, then they shall be separated and disposed of in accordance with the OU-2 ROD. If lead posts and plates are only sporadically observed, then they are not required to be separated from the soil and debris in which the posts and plates were found and shall be treated and disposed with the impacted material.

A 3/4 acre parcel of property containing a log house is located within the Site boundaries on the northeastern portion of the Site adjacent to the Schuylkill River. There is no information indicating that battery breaking-related operations were conducted on this property and the

contamination appears to be primarily surficial. Soils on this parcel shall be remediated to a lead concentration of 200 mg/kg as a result of the excavation of soils required by Appendix G of the Consent Decree. The depth of excavation shall range from 0.5 feet to 3.0 feet covering approximately 95% of the property. The excavation will remove soils with lead levels exceeding the EPA residential screening criterion and the PADEP residential cleanup standard; therefore, this property shall not require deed restrictions following remediation and may once again be used for residential purposes. Post-excavation sampling will be performed to confirm that the property is remediated to the lead concentration of 200 mg/kg. Post-excavation sampling on this parcel shall also include two test pits which shall extend through the soil to the top of the bedrock.

The construction of the six-foot fenced topped with barbed wire shall be limited to the Site boundaries along Fisher Dam Road to the north and the base of the railroad embankment to the west. Construction fencing shall be used along the boundaries of the Site adjacent to Mill Creek and the Schulykill River. All fencing shall be removed following the cleanup subject to the property owner's approval.

V. EVALUATION OF MODIFICATIONS

Overall Protection of Human Health and the Environment

The modifications to the remedy include remediating a 3/4 acre parcel of property to a lead concentration of 200 ppm, half of the EPA residential screening level of 400 ppm, below which, no further action is typically required. The 200 ppm cleanup standard is also below PADEP residential cleanup criteria of 500 ppm of lead in soil (to a depth of 15 feet). Modifying the future use of this property to allow residential use does not impact the overall protection of human health and the environment.

With the exception of the Appendix G Area, the remainder of the Site property will be remediated to the industrial standard for lead of 1000 mg/kg. Deed restrictions must continue to be maintained for this portion of the Site restricting future use to industrial only. The onsite automobile body garage and nearby brick structure are included in this area.

Testing individual piles of marginally contaminated soil (i.e., soil from outside of the Containment Area) prior to treatment does not alter the extent or volume of soil excavated and consequently does not alter the overall protection of human health and the environment at the Site. Regarding placement of the excavated material in an off-site landfill, materials failing to meet the Land Disposal Restrictions. ("LDRs") will be treated prior to disposal. This is consistent with the OU-2 ROD remedy. Soil and debris which do not require treatment because they already meet the LDR treatment standard and all other disposal requirements of the receiving landfill, will be transported from the Site to the landfill without treatment. Off-site disposal of this waste stream is also deemed protective of human health and the environment since the wastes meet all applicable LDRs and the requirements applicable to the receiving landfill.

Limiting the excavation of soils in the Appendix G Area provides equal overall protection of human health and the environment because confirmation sampling will verify that all soil with a lead concentration greater than 200 ppm within the upper twelve inches is excavated. Backfilling soil with lead concentrations less than 1000 ppm in areas requiring remediation in the OU-2 ROD is consistent with the OU-2 remedy and thereby provides the same protection of human health and the environment. Additional protection is provided since one foot of clean fill and/or topsoil will be placed above any Site soils used as backfill to eliminate any direct contact threat should any soils inadvertently exceed the acceptable level (1000 ppm of lead in soil).

Limiting the separation of lead posts and plates will not modify the overall protection of human health and the environment because the volume of posts and plates is expected to be minimal and any incidental posts or plates will ultimately be deposited in an off-site secure landfill. Lead posts and plates have not been detected among the soils in the Appendix G Area or in the soils outside of the Containment Area. If any lead posts and plates are detected, they will typically be among the most contaminated soils, such as those found in the Containment Area. Soils and battery casings from the Containment Area will be treated along with any incidental posts and plates, and will meet the LDRs and all other applicable requirements of the receiving landfill. Significant volumes of lead posts and plates, defined as greater than any combination of plates and/or posts in excess of five per cubic foot will be separated prior to treatment. Any lead posts or plates separated from the waste stream prior to treatment will be shipped off-site for recovery and/or disposal as a hazardous waste to a RCRA permitted facility.

Modifying the extent and duration of fencing provides similar overall protection to human health and the environment. The OU-2 ROD requires the excavation of soil with a total lead level exceeding 1000 ppm. Except for the Containment Area, the OU-2 ROD does not require the backfilling of excavation areas. The modifications described above will result in a more comprehensive cleanup. Following the cleanup, the Appendix G Area including the residential property containing the log house, will be remediated to a lead concentration of 200 ppm. Areas containing backfilled soils with a lead concentration of 200 - 1000 ppm will be covered with minimum of one foot of clean fill and/or topsoil. The remainder of the excavation areas will be restored with a minimum of six inches of imported topsoil. Modifiying the extent and duration of fencing is appropriate considering all of the changes described above.

Allowing the remedial action contractor to develop the sequencing of excavations shall provide greater overall protection since it will minimize the length of time any particular excavation area is left open.

Compliance with Applicable or Relevant and Appropriate Requirements ("ARARs")

The ROD Amendment will comply with all applicable or relevant and appropriate chemical-, location- and action-specific ARARs. There are no location-specific ARARs for this ROD Amendment. In addition, the selected remedy will meet all To Be Considered Standards ("TBCs"). Those ARARs, and TBCs are the following:

1. Chemical-Specific ARARs

PADEP has identified the Land Recycling and Environmental Remediation Standards ACT, 35 Pa. Laws 2 (Act II), as an ARAR for this remedy; however, EPA has determined that Act II does not, on the facts and circumstances of the soil remedy in this ROD Amendment, impose any requirements more stringent than the federal standards. Accordingly, the soil cleanup standards are set forth in the OU-2 ROD and in this ROD Amendment.

2. Action-Specific ARARs

The substantive requirements of the federally-approved State Implementation Plan for the Commonwealth of Pennsylvania, 25 Pa. Code §§ 123.1 - 123.2; the National Ambient Air Quality Standards for Particulate Matter in 40 C.F.R. §§ 50.6 and 50.7; Pa. Code §§ 131.2 and 131.3 to control fugitive dust emissions generated during remedial activities.

The substantive provisions of the Land Disposal Restrictions of the Resource Conservation and Recovery Act, 40 C.F.R. § 268.48-49, to address treatment of lead-contaminated soil failing TCLP.

The more stringent substantive provisions of either 25 Pa. Code §§ 262a, 264a (Subchapter L) or 25 Pa. Code §§ 75.262 and 75.264(t).

The substantive requirements of Pennsylvania's Residual Waste Management regulations concerning analysis of waste, 25 Pa., Code § 287.54, and Pennsylvania's Residual Waste requirements, 35 P.S. § 6016.301-302.

3. TBCs

40 C.F.R. § 6.302(b) and Executive Order No. 11988 addressing EPA activities in floodplains.

EPA's "Management of Remediation Waste Under RCRA," EPA530-F-98-026, October 14, 1998, addressing Areas of Contamination in which contaminated soils are to be consolidated.

Long-term Effectiveness and Permanence

The modifications described above provide greater long-term effectiveness and permanence than the original remedy. The cleanup goals in this revised approach are more stringent than in the original OU-2 remedy and excavation areas will only be limited if sampling data demonstrate the cleanup level has been reached. All wastes disposed at the off-site landfill will meet the LDRS and all other requirements applicable to the receiving landfill.

Limiting the separation of lead posts and plates will not affect the long-term effectiveness and permanence of the remedy since all plates and posts will be removed from the Site. Neither altering the sequence of the excavation nor modifying the future use of the 3/4 acre parcel of property affect the long-term effectiveness and permanence of the remedy. Remediating the 3/4 acre parcel to a lead concentration of 200 ppm results in unrestricted future land use of the property.

Limiting the extent and duration of the Site fence will provide equivalent long-term effectiveness and permanence since the OU-2 ROD excavation area will be covered with a minimum of six inches of topsoil. One foot of clean fill and/or topsoil will be placed above any Site soils used as backfill. The remaining soils outside of the OU-2 ROD area (Appendix G soils) will be excavated to a lead concentration of 200 ppm. Furthermore, limiting the duration of fencing will not modify the long-term effectiveness and permanence of the remedy because a more extensive and protective soil cleanup will be conducted.

Reduction of Toxicity, Mobility, or Volume Through Treatment

All excavated soil and debris will meet the LDRs prior to being transported fiorn the Site under both the OU-2 ROD remedy and for the modified approach discussed above. Sampling marginally contaminated wastes may allow approximately 35,000 tons of soil and debris to be removed from the Site without treatment prior to off-site disposal. Eliminating the treatment of this material will decrease the total volume disposed in the off-site landfill because of the increase in volume resulting from the treatment process that would have been unnecessarily conducted. Backfilling soils with a lead concentration less than 1000 ppm will also decrease the amount of soil which does not require treatment pursuant to the LDRs and will decrease the volume of soil transported off-site to the landfill.

The total volume of soil excavated will be reduced by limiting the excavation in the Appendix G area if confirmation sampling reveals the 200 pom lead cleanup level has been reached. Positive confirmation sampling results will limit the excavation of soils which was originally selected to be twelve inches from the surface throughout the entire Appendix G area.

Limiting the separation of lead posts and plates will not alter the evaluation of this criterion since the incidental posts and plates encountered should be limited to the Containment Area. All soil and debris excavated from the Containment Area will be treated to meet the LDRs prior to off-site disposal. Modifying the sequence of the excavation activities, altering the future use of the 3/4 acre parcel and limiting the extent and duration of fencing do not impact the evaluation of this criteria.

Short-term Effectiveness

Limiting the excavation in the Appendix G Area and backfilling soils that contain less than 1000 mg/kg of lead improve short-term effectiveness by decreasing the volume of soil transported from

the Site and decreasing the number of trucks bringing clean fill material to the Site. These changes and limiting the separation of lead posts and plates will increase the short-term effectiveness by shortening the construction schedule. Decreasing the duration of the cleanup will reduce the overall risks to onsite workers and reduce the potential for an off-site release.

Modifying the sequencing of excavation activities improves the short-term effectiveness by minimizing the amount of time an excavation area is left open and improves GBC's ability to secure exposed areas prior to potential flood events. Under the current remedial design and schedule, short-term effectiveness is further improved by addressing the most contaminated portion of the Site, the Containment Area, last during the drier portion of the construction season.

Modifying the future use of the 3/4 acre parcel and limiting the extent and duration of the fencing will not impact the short-term effectiveness of the cleanup.

Implementability

All of the modifications discussed above are easily implementable and are being executed to increase implementability. Testing material to determine if treatment is necessary or to guide excavation/backfilling activities is an approach commonly employed for impacted material. Modifying the excavation sequence, limiting the seperation of lead posts and plates, and limiting the extent and duration of the Site fence will also improve the implementability of the remedy. Modifying the future use of the 3/4 acre parcel does not impact implementability.

Cost

As a result of reduced treatment and disposal costs, the current estimate to implement the original remedy is approximately $10.7 million. The estimate to implement the alternative remedy is $8.1 million. Therefore, the changes to the remedy discussed in this ROD Amendment will save $2.6 million.

State Acceptance

Numerous discussions have been held with the Commonwealth of Pennsylvania regarding the implementation of the ROD and the modifications. The Commonwealth of Pennsylvania concurred with the above modifications on May 23, 2000.

Community Acceptance

The public comment period began on April 23, 2000 and ended on May 22, 2000. EPA held a public meeting on April 25, 2000 at the Tilden Township Municipal Building. A transcript of the meeting has been included in Administrative Record. The main concern raised during the public meeting regarded the transportation route from the Site. A lengthy discussion was held during which a request was made to use an alternate, Maple Drive, to access Interstate 78. Maple Drive

is currently closed and is only used for emergency access only.

EPA and the responsible party conducting the cleanup contacted the Pennsylvania Department of Transportation ("PENDOT") to discuss the use of Maple Drive. In addition, the EPA Remedial Project Manager and the Chief of the Western PA Remedial Section toured both transportation routes. PENDOT provided a written response on May 10, 2000 denying access to Maple Drive; therefore, the original transportation route will not be modified.

VI. SUPPORT AGENCY COMMENTS

All of the above changes to the remedy have been coordinated with representatives of PADEP pursuant to 40 C.F.R. § 300.435(c)(2).

VII. AFFIRMATION OF THE STATUTORY DETERMINATIONS

EPA has determined that the revised remedy will comply with the statutory requirements of CERCLA § 121, 42 U.S.C. § 962l. Considering the new information that has been developed and the changes to the selected remedy, EPA believes that the remedy will remain protective of human health and the environment, comply with Federal and State requirements that are applicable or relevant and appropriate to this Remedial Action as described in the OU-1 and OU-2 RODs for this Site, and are cost-effective. In addition, the revised remedy utilizes permanent solutions and alternative treatment technologies to the maximum extent practicable for this Site.

VIII. PUBLIC PARTICIPATION

EPA provided a Draft Amendment to the RODs for OU-1 and OU-2 for public comment as part of the Administrative Record file on April 13, 2000. The Administrative Record also includes the RODs for OU-1 and OU-2 and all documents that formed the basis for EPA's selection of the cleanup remedy in the RODs. This Amendment and other related documents and the information upon which it is based have been included in the Administrative Record file and the information repository for this Site. The Administrative Record is available for public review at the locations listed below:

Hamburg Public Library
35 North Third Street
Hamburg, PA 19526
(610) 562-2843

U.S. EPA, Region III
6th Floor Docket Room
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3157 (please call for an appointment)

The notice of availability of these documents was published in the Reading Eagle on April 23, 2000. The public was provided thirty (30) days from the notice date to submit comments. EPA did not receive any written comments during the public comment period.

5/31/00
Date

Abraham Ferdas, Director
Hazardous Sites Cleanup Division
U.S. EPA Region III

RESPONSIVENESS SUMMARY
FOR THE
AMENDMENT TO THE RECORD OF DECISION
OPERABLE UNITS ONE AND TWO
BROWN'S BATTERY BREAKING SUPERFUND SITE
TILDEN TOWNSHIP, BERKS COUNTY, PENNSYLVANIA

Public Comment Period
April 23, 2000 through May 22, 2000

Responsiveness Summary
Brown's Battery Breaking Superfund Site
Tilden Township, Berks County, Pennsylvania

EPA did not receive any written comments during the public comment period; therefore, the Responsiveness Summary will be limited to the comments and questions received during the public meeting.

Summary of Major Comments and Questions Received During the Public Meeting and EPA Responses

This section documents comments and questions raised during the April 25, 2000 Public Meeting which was held at the Tilden Township Municipal Building in Myerstown, PA.

Summary of Commentors' Major Issues and Concerns During the Public Meeting

This section provides a summary of commentors' major issues and concerns and EPA's response to those issues and concerns raised during the April 25, 2000 public meeting. A copy of the complete transcript from that meeting is included in the Administrative Record. "Commentors" may include local homeowners, including their friends and relatives, representatives from nearby businesses, elected officials, and representatives of potentially responsible parties ("PRPs").

1. A citizen was concerned about the number of trucks that would pass by his home and wanted to know if the bond posted by the PRP for road repair could be used to repair any damage to his home caused by truck traffic. A follow-up question by a second citizen requested EPA to determine if citizens have any recourse to be compensated for damage to their homes or other personal property.

EPA Response: *The bond may not be used to compensate citizens for damages to their residence or other personal property. EPA recommended that if any citizens are concerned about possible damage to their homes (i.e., cracks in plaster), they should take photographs or video pictures documenting the conditions prior to the start of the cleanup and contact EPA and Exide (the responsible party performing the cleanup) as soon as they suspect any damage may have occurred. Compensation for any damage would be a private matter between Exide and the*

homeowner.

2. A citizen asked if the community will be given a follow-up report on the success of the cleanup.

EPA Response: *EPA recommended that next public meeting be heId in the fall of 2000 after the completion of the cleanup.*

3. A citizen inquired about the amount of lead contamination at the site.

EPA Response: *The worst areas contain up to "tens of thousands" of parts per million lead.*

4. A citizen expressed concern that the current site owner may re-contaminate the site by painting trucks with lead paint after the cleanup is completed.

EPA Response: *The owner will have the ability to continue to use the front half of the site for industrial use (provided he complies with all deed restrictions). EPA, the U.S. Fish and Wildlife Service and the National Oceanic and Atmospheric Administration will be conducting follow-up inspections for up to fifteen years and would coordinate with the State and local authorities if inappropriate activities occur.*

5. Several citizens expressed concern about the truck route and recommended the use of Maple Drive to access Interstate 78.

EPA Response*: EPA stated it would follow-up on a re-evaluation of using Maple Drive as an alternate route. EPA contacted the District Engineer, PENDOT and Exide to discuss this alternate route. PENDOT responded to Exide's inquiry regarding Maple Drive (see letter dated May 10, 2000 to Mr. Dustin Shank, Exide from Mr Walter Bortree, PENDOT). In his response, Mr. Bortree stated that "the Maple Drive gated access has been designated for emergency access only and would not be available for your use." A copy of the letter is included in the Administrative Record. In addition, the EPA Project Manager and the Chief of the Western PA Section toured the approved transportation route, as well as the Maple Drive route. EPA concluded that the approved route, although slightly longer remains acceptable.*